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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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**COMMISSIONERS**

GARY PIERCE- CHAIRMAN  
PAUL NEWMAN  
SANDRA D. KENNEDY  
BOB STUMP  
BRENDA BURNS

IN THE MATTER OF THE PETITION OF I- ) DOCKET NO. T-20538A-10-0332  
WIRELESS, LLC FOR DESIGNATION AS AN )  
ELIGIBLE TELECOMMUNICATIONS CARRIER )  
IN THE STATE OF ARIZONA FOR THE )  
LIMITED PURPOSE OF OFFERING LIFELINE ) **COMMENTS ON STAFF REPORT**  
SERVICE TO QUALIFIED HOUSEHOLDS. )  
)  
)

i-wireless, LLC ("i-wireless") submits the following comments on the Staff Report docketed on July 18, 2011. i-wireless intends these comments to minimize areas of dispute regarding its Eligible Telecommunications Carrier ("ETC") designation in Arizona.

**1. Service on Tribal Lands.**

i-wireless agrees with the Arizona Corporation Commission ("ACC" or "Commission") Staff that the Commission has jurisdiction and authority to grant ETC status on Tribal lands. However, the Staff Report does not take an express recommendation on granting i-wireless an ETC designation on Tribal lands. In order to eliminate ALECA's concerns regarding ETC designation on Tribal lands, i-wireless no longer intends to provide Lifeline to persons residing on Federally-Recognized Tribal lands, regardless of whether those lands are served by a Tribal carrier. However, where a zip code covers both non-Tribal and Tribal lands, i-wireless still intends to provide low-income support to those residents in the zip code who do not live on Tribal lands. In order to avoid low-income support to residents of Tribal lands, i-wireless' Lifeline enrollment application will require a street address (not a P. O. Box address) and will include a self-certification of Non-Tribal Land Residency, which will require applicants to self-certify, under penalty of perjury, that they do not reside in Federally-Recognized Tribal lands.

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1           **2.     250 Minute Plan.**

2           One of Commission Staff's proposed conditions is that i-wireless should provide Lifeline  
3 customers who chose the 250 minute plan with free access to Customer Service from i-wireless  
4 handsets. i-wireless agrees to do so if it offers the 250 minute plan to Lifeline customers in  
5 Arizona. However, to be clear, i-wireless may choose not to offer the 250 minute plan to Lifeline  
6 customers in Arizona. If that is the case, i-wireless' marketing materials in Arizona will clearly  
7 reflect that circumstance.

8           **Conclusion.**

9           i-wireless appreciates Commission Staff's recommendation that the Commission approve  
10 i-wireless' Application for Designation as an Eligible Telecommunications Carrier. i-wireless  
11 requests that the Commission approve the Application in this docket as clarified above.

12           RESPECTFULLY SUBMITTED this 26<sup>th</sup> day of July 2011.

13                                   ROSHKA DEWULF & PATTEN, PLC

14  
15           By 

16                                   Michael W. Patten  
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19           Original and 13 copies of the foregoing  
20           filed this 26<sup>th</sup> day of July 2011 with:

21           Docket Control  
22           Arizona Corporation Commission  
23           1200 West Washington Street  
24           Phoenix, Arizona 85007

25           Copy of the foregoing hand-delivered/mailed  
26           this 26<sup>th</sup> day of July 2011 to:

27           Yvette Kinsey, Esq.  
28           Administrative Law Judge  
29           Hearing Division  
30           Arizona Corporation Commission  
31           1200 West Washington  
32           Phoenix, Arizona 85007

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